

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA,	: Case No.: 3:25MJ070-PBS
	:
Plaintiff,	: MOTION OF THE UNITED STATES FOR
	: PRETRIAL DETENTION
vs.	:
	:
GUSTAVO RODRIGUEZ-PIEDRA,	:
	:
Defendant.	:

Pursuant to the Bail Reform Act, see 18 U.S.C. § 3142 *et seq.*, the United States moves for the pretrial detention of the defendant because no condition or combination of conditions will reasonably assure his or her appearance and/or the safety of any person or the community. Specifically:

**A. NO REBUTTABLE PRESUMPTION OF DETENTION**

In this case, although the Bail Reform Act does not create a rebuttable presumption that the defendant should be detained pending further proceedings, the Court nevertheless must consider whether the statutory factors weigh for or against pretrial release. See 18 U.S.C. §§ 3142(g)(1)-(4).

**B. HEARING REQUIRED**

The Bail Reform Act requires the Court to hold a hearing to determine whether to release or to detain the defendant because the United States requests such a proceeding and the case concerns:

- a serious risk that the defendant will flee. See 18 U.S.C. §§ 3142(f)(2)(A).

**C. TIMING OF HEARING**

The United States requests that the Court set the detention hearing in three (3) business days (i.e., excluding any intermediate Saturday, Sunday, or legal holiday) and order the defendant detained pending that proceeding. See 18 U.S.C. § 3142(f).

**D. CONCLUSION**

Based on the foregoing as well any evidence and argument presented at the detention hearing in this matter, the United States respectfully submits that no condition or combination of conditions will reasonably assure his or her appearance and/or the safety of any person or the community. The defendant therefore should be detained pending further proceedings.

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